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January 21, 1992

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Beaver Valley Power Station, Unit 2
Docket No. 50-412, License No. NPF-73
Updated Inservice Testing (IST) Program, Issue 1, Revision 8

The purpose of this submittal is to provide the NRC with an informational copy of revisions to the Beaver Valley Unit 2 IST program.

Enclosure 2 contains the Issue 1, Revision 8 changes which are to be inserted in your copy of the Unit No. 2 IST Program. It has been determined that these changes do not require prior NRC approval. This is based on the determination that the changes are either:

- editorial in nature, or
- similar to NRC recommendations found in the Beaver Valley Unit 1 IST Program Technical Evaluation Report, or
- in compliance with the 1983 Edition through Summer 1983 Addenda of the ASME XI Code, and in compliance with the positions delineated in Attachment 1 of Generic Letter 89-04.

Enclosure 1 provides a summary of the IST program changes which have been incorporated into Revision 8.

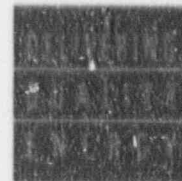
If you have any questions regarding this submittal, please contact Steve Sovick at (412) 393-5211.

Sincerely,

J. D. Sieber
J. D. Sieber

cc: Mr. J. Beall, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. A. W. DeAgazio, Project Manager
Mr. R. Saunders (VEPCO)

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ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV.8)

A) The following changes are "editorial" or "non-technical" in nature:

NOTE: The format changes being made in the BVPS-2 IST Program (Rev. 8) are consistent with the same format changes already made in the BVPS-1 IST Program (Rev. 7).

- 1) The following list general editorial changes made throughout the BVPS-2 IST Program: (NOTE: Use of sidebars to identify "general" whole page changes to the Unit 2 IST Program will not be used, but "specific" changes will continue to be identified by sidebars.)
 - a) Each reference to an OST was revised to reflect the new Writer's Guide format (i.e., 2OST-11.14 versus the old format of OST 2.11.14). (Not identified by sidebars.)
 - b) The "System" title descriptions on the Pump and Valve Outline Sheets (pages 6 - 35 and 49 - 115) were revised to better describe the individual systems/subsystems of pumps or valves listed on the sheets. Some pump's "Function" descriptions were also revised.
 - c) The format of the "Pump Testing Outline" sheets (pages 6 - 35) was revised to also include each pump's "Drawing OM Number" and "Drawing Coordinates" per NRC recommendations. The "Type" of pump (e.g., Centrifugal, Vertical, or Positive Displacement) has also been added. In addition, more detail was added to each sheet's "Comments" section to better describe how and where the pump parameters would be obtained. (Not identified by sidebars.)
 - d) The format of the "Valve Testing Outline" sheets (pages 49 - 115) was revised per NRC recommendations to also include each valve's "size" in inches and "valve type". The "Comments" section for each valve was also expanded to include the "safety position" for testing each valve, and whether a remote position verification (RPV) is performed (not identified by sidebars). The "Valve Testing Requirements" section was also revised to include a description of the above on pages 46 and 47.
 - e) The "Alternate Test" section of each Cold Shutdown Justification and Relief Request (pages 117 thru 182) was also revised to be more consistent in wording, and to include more detail and the safety position for testing each valve.
- 2) "(CSD) - Cold Shutdown Frequency" was added under Item 2 on Page 4.
- 3) The "Remarks" section for Residual Heat Removal Pumps [2RHS*P21A,B] (pages 11 and 12) was revised to say that each "pump is tested quarterly during cold shutdowns and refueling outages." The "Frequency" in the "2OST" column was changed from (Q) to (CSD, R). Pump Relief Request No. 1 (page 37) was also revised to reflect this clarification under "Alternate Test."

ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV.8) (Cont'd)

- A) The following changes are "editorial" or "non-technical" in nature: (cont'd)
- 4) Added the statement that remote position verifications would "normally be done at refuelings" to the end of the fourth paragraph on page 42.
 - 5) Added new Item B.1 on page 44 as follows: "If the inoperable check valve is specifically identified in the technical specifications, then the applicable technical specification action statements must be followed." This item was accidentally omitted from the IST Program for check valves and is being added for completeness. The requirement has existed in TSAP 3.10, "IST Administrative Procedure", Section 5.7.3.B.
 - 6) Added to the end of the paragraph following Table IWV-3700-1 on page 45, "except where remote position verification is required."
 - 7) Under Item A.2. on page 46, "DMP - Damper (Manual)" was added to the list of valve actuator types, and "Valve" was added after each abbreviation description.
 - 8) Added the word "Frequency" after each frequency listed under Item A.7 on page 47. Also added "RPV - Remote Position Verification normally at Refueling" to the list of abbreviations.
 - 9) Noted in the "Comments" section for the following weighted arm check valves and under the "Alternate Test" section of their associated CSJ's that they are full stroked "by Mechanical Exerciser": [2RCS*68 and 72], [2CHS*31, 473, 474, 475, and 476], [2SIS*42, 46, 47, 83, 84, 94, 95, 130, 132, and 133], [2QSS*3, 4, and 267], [2RSS*29, 30, 31, and 32], [2FPW*382, 388, 753, and 761], and [2IAC*22] (pages 49, 51, 55, 62, 64, 74, 76, 106, 107, 117, 119, 124, 128, 129, 132, 143, and 146).
 - 10) Corrected the NSA position for SI Accumulator Test Line Isolation to RWST Valve [2SIS*MOV842] from "O" to "S" (page 66).
 - 11) Deleted reference to 2OST-30.3 (P21B SWS Pump Test) for partial stroking of "A" Supply Header Check Valve [2SWS*106] and reference to 2OST-30.2 (P21A SWS Pump Test) for partial stroking of "B" Supply Header Check Valve [2SWS*107] (page 100).
 - 12) Revised the CMP referenced for Diesel Generator HX Supply Header Check Valves [2SWS*110, 111, 112, and 113] (pages 100 and 101) to "1/2CMP-75-WAFER CHECK-1M."
 - 13) Added that a Position Test (POS) for "passive" Main Steam Valve Area Cooler PCV's [2SWS*PCV120A and B] would be performed Monthly (M) by 2OST-30.4 and 30.5 (page 101).
 - 14) Corrected the referenced I4 Logs for Main Steam Valve Area Cooler Supply Line Check Valves [2SWS*1103 and 1104] (page 103) to 2OM-54, "Log I4-39", and for D/G Starting Air Tank Check Valves [2EGA*130 and 131] (page 109) to "Log I4-31".

ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV.8) (Cont'd)

- A) The following changes are "editorial" or "non-technical" in nature: (cont'd)
- 15) Changed the referenced frequency for stroking and timing the D/G Air Start Solenoid Valves [2EGA*SOV202-1, 202-2, 203-1, 203-2] (page 109) from Monthly (M) to Quarterly (Q) per 20ST's 36.1 and 36.2.
 - 16) The "Alternate Test" section for Relief Request No. 1 (page 153) was clarified to say that 2BVT 2.47.2 may be performed to leak test the applicable type C relief valves "in lieu of 2BVT 1.47.5". Also corrected a typo on the list of Containment Isolation Valves for [2SSR*AOV112A2] (page 154).
 - 17) Clarified those Relief Requests (13, 14, 15, 16, 17, 18, 19, and 21) that perform a leak test to verify check valve closure to specify in the "Alternate Test" section that "Valve closure is verified by a leak test at refueling per....." (pages 162 thru 167).
 - 18) Clarified the "Alternate Test" section of Relief Request No. 22 (page 168) to say, "Stroked and indirectly timed on an alternating frequency in conjunction with monthly diesel generator 20ST's 36.1 and 36.2 to ensure compliance with ASME XI requirements for stroke testing on a quarterly frequency. Assign a limiting stroke time based on EDG
- B) The following changes are being made in accordance with the ASME XI Code and Generic Letter No. 89-04:
- 1) Added full flow testing of the HHSI Charging Pumps [2CHS*P21A, B, and C] and the LHSI Pumps [2SIS*P21A and B] by 20ST-11.14 at refueling outages to their Pump Testing Outline Sheets (pages 6, 7, 8, 13, and 14). Also added full flow testing of the Auxiliary Feedwater Pumps [2PWE*P22, 23A, and 23B] by 20ST's 24.4 and 24.6 at refueling outages to their Pump Testing Outline Sheets (pages 26, 27, and 28) to support the "Minutes of the Public Meetings on Generic Letter No. 89-04," response to Question No. 48. In the response to this question, the NRC stated, "they would prefer a more comprehensive test be performed at some reduced frequency rather than relying only on the mini-flow test that is performed quarterly. This particular issue may be a topic of another generic letter addressing inservice testing in the future." All three groups of pumps are already being full flow tested during refueling outages to support this recommendation, but ASME XI acceptance criteria was not being applied in all cases. It will be applied for testing during 3R.
 - 2) The "Remarks" section for HHSI and LHSI Pumps above (pages 6, 7, 8, 13, and 14) were revised to say that each "pump is tested quarterly on recirculation flow and at full flow during refueling outages."

ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV.8) (Cont'd)

- B) The following changes are being made in accordance with the ASME XI Code and Generic Letter No. 89-04: (continued)
- 3) Deleted reference to Pump Relief Request No. 3 for the Recirc Spray Pumps [2RSS*P21A, B, C, and D] on pages 19 thru 22 since installation of a temporary test gauge will now be the permanent test method used to measure pump suction pressure (Pi) versus using the level in the Containment sump test dam. Pump Relief Request No. 3 (page 39) was also revised to reflect this change.
 - 4) Noted in the "Comments" column for Atmospheric Steam Dump Valves [2SVS*PCV101A,B,C] and Residual Heat Release Valve [2SVS*HCV104] (page 92) that they will also be "Failed Closed" in addition to stroking and timing them open per 20ST-1.10. The Basis for CSJ No's. 37 and 38 (page 136) were also revised to clarify that, Full "or partial" stroking open of these valves during normal operation cannot be performed because a reduction in plant power....limitations. This was a recommendation by the ISEG per Letter NDISSEG:0457, dated 1/3/91.
 - 5) Deleted Charging Pump Lube Oil Cooler Check Valves [2SWS*29,216,1039, 1040] from the BVPS-2 IST Program since their internals have been removed per DCP-1664.
 - 6) Added D/G Lube Oil Strainer Isolation Valves [2EGO*114,115,116,117] (page 111) to the BVPS-2 IST Program as Class 3, Category B manual valves which will be stroked open quarterly per 20ST-47.3A(3B).
 - 7) Reworded the Basis for CSJ No. 52 (page 145) to delete reference to the old test (20ST-47.3A) that was performed to stroke and time these valves. In addition, the Basis was revised to reflect the change to Tech Spec 3.4.6.1 by Tech Spec Amendment No. 23 as follows: "....are temporarily inoperable and places the plant in a twelve hour action per Tech Spec 3.4.6.1 with additional requirements to verify the containment sump discharge flow measurement system operable and to perform a RCS water inventory balance in four hours. Without these additional provisions a forced shutdown is required in six hours."
- C) The following changes are being incorporated based on NRC comments made in the Technical Evaluation Report (TER) for the Unit 1 IST Program second ten year interval that also affect Unit 2:
- 1) The "Remarks" section for the Turbine Driven Auxiliary Feedwater Pump [2FWE*P22] (page 26) was revised to say that each "pump is normally tested monthly on recirculation flow and at full flow when in Mode 3 during startup from cold shutdowns and refueling outages." In addition, the "Frequency" in the "20ST" column for 20ST-24.4 was changed from (R) to (CSD, R).

ENCLOSURE 1

SUMMARY OF CHANGES TO THE UNIT 2 IST PROGRAM (REV.8) (Cont'd)

- C) The following changes are being incorporated based on NRC comments made in the Technical Evaluation Report (TER) for the Unit 1 IST Program second ten year interval that also affect Unit 2: (continued)
- 2) The "Remarks" sections for the Motor Driven Auxiliary Feedwater Pumps [2FWE*P23A and B] (pages 27 and 28) were revised to say that each "pump is normally tested monthly on recirculation flow and at full flow during cold shutdowns and refueling outages." In addition, the "Frequency" in the "2OST" column for 2OST-24.6 was changed from (R) to (CSD, R).